

THE WEIR LAW FIRM, LLC
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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SAYER TECHNOLOGIES, S.L.,
:
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Plaintiff, :
:
:
- v - :
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:
VISCOFAN COLLAGEN USA INC., :
f/k/a NITTA CASTINGS INC., :
:
Defendant. :
:
:

Civil Action No. 23-2257 (MAS-TJB)
Hon. Tonianne J. Bongiovanni, U.S.M.J.

**NOTICE OF MOTION FOR
SUMMARY JUDGMENT AND
REQUEST FOR ORAL ARGUMENT**

To: Dariush Keyhani, Esq.
Keyhani LLC
1050 30th Street NW
Washington, DC 20007
Attorneys for Defendant

SIRS:

PLEASE TAKE NOTICE that on a date and at a time to be designated by the Court, the Plaintiff, Sayer Technologies, S.L., by and through its attorneys, The Weir Law Firm, LLC, shall move before the Honorable Tonianne J. Bongiovanni, U.S.M.J., Clarkson S. Fisher Federal Bldg. & U.S. Courthouse, 402 E. State Street, Trenton, New Jersey 08608, for an Order granting the Plaintiff summary judgment pursuant to L.Civ.R. 56.1 dismissing Defendant's Counterclaims in their entirety.

PLEASE TAKE FURTHER NOTICE that the Plaintiff will rely upon the accompanying Declaration of Vidal Ernesto Garrido Zuniga, Statement of Material Facts, and Memorandum of Law in support of the motion.

PLEASE TAKE FURTHER NOTICE that the moving party requests oral argument if opposition is timely filed and if same is granted by the Court.

THE WEIR LAW FIRM, LLC
Attorneys for Plaintiff,
Sayer Technologies, S.L.

By: /s/ Bonnie M. Weir
Bonnie M. Weir

Dated: October 21, 2024
Bridgewater, New Jersey

CERTIFICATION OF SERVICE

I hereby certify that an original of the within Notice of Motion, Declaration of Vidal Ernesto Garrido Zuniga, Statement of Material Facts, Memorandum of Law, and proposed form of Order were forwarded this day, via electronic filing, to the Clerk of the Court, Clarkson S. Fisher Federal Bldg. & U.S. Courthouse, 402 E. State Street, Trenton, New Jersey 08608, and that copies of same were forwarded on this date, via electronic filing, to the Hon. Tonianne J. Bongiovanni, U.S.M.J. (with an additional copy by regular mail), and Dariush Keyhani, Esq., counsel for Defendant via electronic filing/service.

By: /s/ Bonnie M. Weir
Bonnie M. Weir

Dated: October 21, 2024
Bridgewater, New Jersey